



Department of Energy
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NOV 24 2003

Mr. James A. Saric, Remedial Project Manager
United States Environmental Protection Agency
Region V, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-0054-04

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**CLARIFICATION OF THE RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT PROJECT SPECIFIC PLAN FOR AREA 6 SOLID WASTE
LANDFILL EXCAVATION CHARACTERIZATION**

- References:
1. Letter DOE-0033-04, G. Griffiths to J. Saric and T. Schneider, "Transmittal of the Responses to the Ohio Environmental Protection Agency Comments on the Draft Project Specific Plan for Area 6 Solid Waste Landfill Excavation Characterization," dated November 5, 2003
 2. Letter from T. Schneider to G. Griffiths, "Disapproval-Transmittal of the Responses to the OEPA Comments on the Draft Project Specific Plan for Area 6 Solid Waste Landfill Excavation Characterization," dated November 6, 2003
 3. Letter from J. Saric to J. Reising, "A6 Solid Waste Landfill PSP," dated November 18, 2003

This letter is to clarify DOE's approach regarding the Solid Waste Landfill (SWL) excavation and responds to your concerns that led to the disapproval of the responses to comments to the SWL Excavation Characterization Project Specific Plan (PSP).

The SWL is currently being excavated as an accelerated approach to mitigate the leaching of significant levels of uranium and radium-226 contamination into an adjacent ditch connected to Paddys Run. This excavation is accelerated with respect to the remainder of

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Area 6, which surrounds the SWL and is an area of the site that will not undergo remedial activities for a couple of years. Notably, the area that surrounds the SWL contains railroad lines that currently support Waste Pit operations. DOE recognizes that there is potential for contamination, albeit at much lower concentrations, to remain in the slopes of the excavation after the currently accessible portion of the solid waste has been removed, similar to that of the Lime Sludge Pond excavation. However, it is necessary for this potential contamination to remain unexcavated at this time to avoid undue impact to the rail lines. As a result, further predesign activities will be initiated in early 2004 with a new Area 6 General Area predesign PSP to identify the extent to which this contamination remains. These predesign activities will also identify the extent to which Area 6 in general is contaminated. Once the full scope of contamination within the general area of Remediation Area 6 has been identified, a remedial design package, including the area surrounding the SWL footprint, will be submitted for your review and approval in late 2004 or early 2005. In the interim, after the current designed excavation at the SWL has been completed, sampling of the sidewalls for indicator constituents of concern will be performed immediately to gain information as to the extent of any potentially remaining contamination. The collection of these samples will be documented in a variance/field change notice form to the subject PSP For Area 6 SWL Excavation Characterization and submitted for your review and approval.

DOE also recognizes that with the potential for contamination to exist in the sidewall slopes at the end of the current SWL excavation, certification activities cannot commence. Any certification activities for the SWL will not begin until the area surrounding the SWL has also been fully remediated in late 2005.

Upon acceptance of this clarification, we request your approval to implement the PSP For Area 6 SWL Excavation Characterization as revised according to the previous comment responses.

If you have any questions or concerns, please contact Johnny Reising at (513) 648-3139.

Sincerely,

FCP:Reising

W.J. Taylor
William J. Taylor
Director

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Mr. James A. Saric
Mr. Tom Schneider

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cc:

D. Pfister, OH/FCP
J. Reising, OH/FCP
G. Jablonowski, USEPA-V, SR-6J
F. Bell, ATSDR
M. Cullerton, Tetra Tech
M. Shupe, HSI GeoTrans
R. Vandegrift, ODH
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T. Hagen, Fluor Fernald, Inc./MS1
S. Lorenz, Fluor Fernald, Inc./MS41
F. Miller, Fluor Fernald, Inc./MS64
T. Poff, Fluor Fernald, Inc./MS65-2
D. Powell, Fluor Fernald, Inc./MS64
AR Coordinator, MS78
ECDC, Fluor Fernald, Inc./MS52-7